

#17-79

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From: Cannizzaro, Pilar, DCA <pilar.cannizzaro@state.nm.us>
Sent: Thursday, February 18, 2016 11:18 AM
To: Stephen Delsordo; January2016TowerMtg
Cc: hein@ncshpo.org; Pappas, Jeff, DCA; Biella, Jan, DCA; Wakefield, Andy, DCA
Subject: FCC non compliant tower meeting follow up

Federal Communications Commission
Office of the Secretary

Importance: High

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Dear Steve,

The staff at the NM SHPO was glad to be in attendance at the recent 2-day FCC Workshop to address possible collocations on non-compliant towers and to work on a collective solution among the SHPOS, THPOS, Tribes, FCC and the telecommunication industry to resolve current problems with said towers.

We believe some progress was made towards reaching a common solution by all parties involved but that some work still needs to be done to reach that goal. The NM HPD shares the main concern expressed by other SHPOS as well as most of the tribes in attendance that it is critical to know the number of non-compliant towers and their location for it could affect the strategy for future consultation, the workloads generated by retroactive reviews of those towers and other factors directly affecting our staff's ability to handle those consultations moving forward. The number of towers provided should include all those considered "twilight" structures (built from 2001 to 2005) by the industry, as well as any other non-compliant towers built after 2005.

Additionally, once those numbers are identified and provided to all parties affected, we would like to see measures put in place in order to manage the potential workloads resulting from these retroactive reviews, and a limited volume of reviews per month that could realistically be managed by the staffs affected. Lastly, the NM SHPO would like to stress how important it is for us to receive complete submittals for any given tower, whether for a retroactive review or a new one, so staff is not burdened with our own internal research of listed or eligible properties within the tower's APE. This can be best achieved by using local, qualified consultants in each state where the towers are located, and not consultants unfamiliar with the cultural make-up and types of properties of any particular region.

We realize most of these comments were already discussed at the meeting by various parties, our staff included, but they bear repeating as part of our follow-up feedback on the meeting. We're confident that the FCC and all other participants will eventually find a compromise to best address all reviews of the potential 4,000 + towers seeking future collocation without having had earlier Section 106 review by SHPOS and THPOS nationwide. We much appreciate the opportunity to participate in this ongoing dialogue and look forward to a resolution of the issues in a near future. Please keep us posted in that regard. Thank you,

Jan Biella, Pilar Cannizzaro, and Andy Wakefield

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